

**DEPARTMENT OF THE TREASURY**

**ALCOHOL AND TOBACCO TAX AND TRADE BUREAU**

**Supporting Statement Part A -- Information Collection Request**

**OMB Control Number 1513-0132**

**Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery**

**A. Justification**

*1. What are the circumstances that make this collection of information necessary, and what legal or administrative requirements necessitate the collection? Also align the information collection to TTB's Line of Business/Sub-function and IT Investment, if one is used.*

The Alcohol and Tobacco Tax and Trade Bureau (TTB) administers the Federal Alcohol Administration Act (FAA Act, 27 U.S.C. chapter 8) and portions of the Internal Revenue Code of 1986, as amended (IRC, 26 U.S.C. chapter 51 (distilled spirits, wine, and beer), chapter 52 (tobacco products, processed tobacco, and cigarette papers and tubes), and sections 4181–4182 (firearms and ammunition excise taxes)), pursuant to section 1111(d) of the Homeland Security Act of 2002, as codified at 6 U.S.C. 531(d). In addition, the Secretary of the Treasury has delegated certain FAA Act and IRC administrative and enforcement authorities to TTB through Treasury Department Order 120–01.

Executive Order 12862, Setting Customer Service Standards, sets forth a standard of quality for services provided to the public by Federal agencies—customer service equal to the best in business—and it directs agencies to meet this goal by using surveys and other means to gather customer feedback. To meet this goal, TTB uses various surveys, focus groups, and other information collections to gather feedback on agency programs and service delivery from regulated industry members and other stakeholders in an efficient and timely manner.

This generic clearance and the feedback information collections approved under it provide TTB with information on customer perceptions, experiences, and expectations regarding its programs and services. The collected information can give TTB early warning of issues with services or focus TTB's attention on areas where changes in communication, training, or operations will improve delivery of agency products or services. The approved information collections also allow for ongoing, collaborative, and actionable communications between TTB and its customers. In sum, the collected information allows TTB to improve its program management and service delivery, which helps TTB to ensure that its customers have effective, efficient, and satisfactory experiences when interacting with the agency.

This information collection is aligned with —

- Line of Business/Sub-function: General Government / Taxation Management.
- IT Investment: None.

2. *How, by whom, and for what purpose is this information used?*

TTB uses the surveys, focus groups, usability tests, and other information collections approved under this generic clearance to gather timely feedback from its customers regarding its programs and services. The information collections approved under this clearance focus on areas such as the accuracy, appropriateness, and efficiency of TTB's programs and services, and the timeliness and resolution of service delivery issues. Bureau employees analyze the collected information and make recommendations to help improve TTB programs and service delivery so that TTB customers and stakeholders have effective, efficient, and satisfactory experiences when interacting with the agency.

3. *To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?*

When appropriate, TTB uses electronic or online information collection instruments, such as Survey Monkey, to gather customer feedback on its programs and services.

4. *What efforts are used to identify duplication? Can similar information already available be used or modified for use for the purposes described in Item 2 above?*

The information collections approved under this generic clearance gather customer feedback information that is pertinent and specific to each respondent's experience and interaction with TTB's programs and services. As far as TTB is able to determine, similar information is not available elsewhere.

5. *If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?*

Participation in TTB the surveys and other information collections issued under this generic clearance is voluntary. TTB minimizes the burden on small entities by using sampling and short, easy-to-complete electronic and online collection instruments, and by asking for readily available information. As such, this generic clearance and the information collections approved under it do not have a significant impact on a substantial number of small businesses or other entities.

6. *What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?*

Without the use of the information collections issued under this generic clearance, TTB could not gather timely feedback from its customers regarding its programs and services, and it would not be able to make needed adjustments to its programs and services in order to improve its customer service delivery.

7. *Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines?*

There are no special circumstances associated with this information collection.

*8. What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.*

To solicit comments from the public, TTB published a “60-day” comment request notice for this generic clearance in the Federal Register on June 15, 2021, at 86 FR 31818. TTB received no comments on this information collection in response.

*9. Was any payment or gift given to respondents, other than remuneration of contractors or grantees? If so, why?*

Except as noted below, TTB will not provide payment or other forms of remuneration to respondents to the information collections approved under this generic clearance. In the case of in-person focus groups and usability tests, TTB may provide stipends of up to \$75.00 per participant. In cases where TTB plans to offer a stipend, TTB will provide OMB with justification for the stipend in the request for clearance of the specific information collection.

*10. What assurance of confidentiality was provided to respondents, and what was the basis for the assurance in statute, regulations, or agency policy?*

In general, Federal law at 5 U.S.C. 552 protects the confidentiality of proprietary information obtained by the Government from regulated businesses and individuals, and 26 U.S.C. 6103 prohibits disclosure of tax returns and related taxpayer information unless that section specifically authorizes disclosure. However, TTB provides no specific assurance of confidentiality for the information collected under this generic clearance. For each collection issued under this generic clearance, TTB will include a statement regarding the use of the collected information, including any assurance of confidentiality or any public release of such information.

*11. What is the justification for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact Assessment (PIA) that has been conducted for the information collected under this request and/or the Privacy Act System of Records notice (SORN) issued for the electronic system in which the PII is being stored.*

This generic clearance and the information collections issued under it contain no questions of a sensitive nature. In addition, this clearance and the collections issued under it do not collect personally identifiable information (PII) in any electronic system, and respondents anonymously complete the approved collections, including in-person collections. Therefore, no Privacy Impact Assessment (PIA) or System of Records Notice (SORN) is required for this generic clearance or the information collections issued under it.

However, TTB may use PII, such as names, mailing and email addresses, and telephone numbers, provided under other information collections and stored in various TTB electronic systems to develop lists of, or to contact, potential respondents to the information collection

instruments issued under this generic clearance. These electronic systems include Certificates of Label Approval Online (COLAs Online), Formulas Online (FONL), Permits Online (PONL), Regulatory Major Application System, Special Occupation Tax/Floor Stocks Tax system, and Tax Major Application system. TTB has completed Privacy Impact Assessments (PIAs) for these electronic systems, and TTB has issued a Privacy Act System of Records Notice (SORN) for those systems under “Department of the Treasury, Alcohol and Tobacco Tax and Trade Bureau (TTB) .001—Regulatory Enforcement System of Records,” which TTB published in the Federal Register on February 10, 2021, at 86 FR 8988. TTB’s PIAs are available on the TTB website at <http://www.ttb.gov/foia/pia.shtml>.

12. *What is the estimated hour burden of this collection of information?*

Estimated Respondent Burden: TTB will use a variety of information collections to gather customer feedback from respondents. Respondents will be TTB-regulated industry members, stakeholders, and other members of the public who have contacted or done business with the agency. TTB estimates that it will survey or request feedback from no more than 25,000 respondents annually, with each respondent making one voluntary annual response at an estimated average burden of one hour per response, for a total estimated annual burden of no more than 25,000 hours.

Estimated Respondent Labor Costs: Based on the average fully-loaded labor rate of \$33.39 per hour<sup>1</sup> for all occupations in the beverage and tobacco product manufacturing industries, TTB estimates the annual per-respondent and total respondent labor costs for its generic information collection clearance request as follows:

- 1 Response x 1 Hour per Response x \$33.39 per Hour = \$33.39 per Response x 1 Annual Response per Respondent = \$33.39 per Respondent.
- \$33.39 per Respondent x 25,000 Respondents = \$834,750 in Annual Respondent Labor Costs.

Respondent Record Retention: There is no recordkeeping requirement associated with this generic clearance or the individual information collections approved under it.

13. *What is the estimated annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the hour burden in Question 12 above)?*

There are no annualized costs to respondents associated with this generic clearance or the voluntary information collections issued under it.

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<sup>1</sup> Fully-loaded Labor Rate = Hourly wage rate + benefit costs. For the private sector, this is calculated as the hourly wage x 1.44. Per the most recent U.S. Department of Labor, Bureau of Labor Statistics (BLS), data for National Industry-Specific Occupational Employment and Wage Estimates for NAICS 312100—Beverage and Tobacco Product Manufacturing, the average fully-loaded labor rate per hour for All Occupations is \$33.39 (\$23.19 in wages plus \$10.20 in benefit costs). See the BLS website at [https://www.bls.gov/oes/current/naics3\\_312000.htm](https://www.bls.gov/oes/current/naics3_312000.htm).

14. *What is the annualized cost to the Federal Government?*

The costs to the Federal Government associated with this generic clearance vary by the type of information collection and instrument used to collect customer feedback information.

Non-labor Costs: A typical 5,000 respondent customer satisfaction survey conducted by TTB via an online third-party survey company costs approximately \$700, while focus groups and other in-person information collections cost between \$1,000 and \$4,000 per collection. Given a rate of three online surveys and one in-person information collection per year, TTB estimates that annual cost of the information collections approved under this generic clearance to no more than \$6,100. Printing and distribution costs to the Federal government have decreased to \$0.00 in TTB's cost estimate due to the use of online and electronic distribution and survey methods.

Labor Costs: TTB estimates its labor costs for the development, execution, and analysis of customer feedback surveys and other collections issued under OMB No. 1513–0132 as follows:

Position	Fully-loaded Labor Rate/Hour <sup>2</sup>	Time per Collection	Labor Costs per Collection	Collections Issued Per Year	Total TTB Labor Costs
GS–11, Step 5, I.T. Specialist	\$64.40	40 hours	\$2,576.00	4	\$10,304.00
GS–13, Step 5, Program Annalist or Manager	\$91.79	60 hours	\$5,507.40	4	\$22,029.60
<b>TOTALS</b>	<b>(\$67.954)</b>	<b>100 hours</b>	<b>\$6,795.40</b>	<b>4</b>	<b>\$32,333.60</b>

Total Federal Government Costs: \$6,100.00 in non-labor costs + \$32,333.60 in labor costs = \$38,433.60 in total costs.

15. *What is the reason for any program changes or adjustments reported?*

There are no program changes or adjustments associated with this generic clearance request at this time.

16. *Outline plans for tabulation and publication for collections of information whose results will be published.*

The customer feedback collected under this generic clearance provides useful information to TTB, but it does not yield data that TTB can generalize to the overall population. TTB will use the findings to improve its programs and service delivery, but TTB will not publish or publically release the results of the information collections approved under this generic

<sup>2</sup> Federal Government Fully-loaded Labor Rate = Hourly wage rate x a factor of 1.63 to account for benefit costs. Per the most recent Office of Personnel Management (OPM) wage data, the fully-loaded labor rates for the Washington, DC, wage area are: (1) GS–11, step 5, employee = \$64.40 (\$39.51 in wages plus \$24.89 in benefit costs); and (2) GS–13, step 5 = \$91.79/hour (\$56.31 in wages plus \$35.48 in benefit costs).. See the OPM website at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf).

clearance. However, TTB may receive requests to release collected information from Congress or from the public under the Freedom of Information Act. In response to such requests, TTB will disseminate the findings of information collections issued under this generic clearance when appropriate and such disclosures will include a discussion of the limitation of such qualitative results.

*17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?*

As a cost saving measure for TTB, and to prevent user confusion, TTB is seeking approval not to display the expiration date for OMB approval of this generic clearance on any information collections issued under it. By not displaying the expiration date of this generic clearance, TTB will not have to update the expiration date on reusable customer survey and other information collection instruments, whether issued on paper or electronically. Not displaying the OMB approval expiration date on information collection instruments issued under this generic clearance also will avoid confusion among members of the public who may respond to reused collections with expiration dates displayed on them that have passed.

*18. What are the exceptions to the certification statement?*

- (f) This is not a recordkeeping requirement.
- (i) No statistics are involved.